

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2018 SEP 27 AM 10:43

DEPUTY CLERK *RL*

UNITED STATES OF AMERICA

NO.

V.

ASIF ALI

3-18CR-483-M

INFORMATION

The United States Attorney Charges:

At all times material to the information:

Introduction

1. Captain Limousines, Inc. (Captain Limousines) was a Texas corporation founded by defendant **Asif Ali** on April 24, 2008. When incorporated, Captain Limousines was based in Irving, Texas. Captain Limousines specialized in private transportation and provided various types of chauffeured limousine vehicles for various transportation needs. In the filed incorporation documents, **Ali** was listed as the sole Registered Agent and Chief Executive. The filed incorporation documents also represented that Noor J. Ali and Abdul B. Butt were Executives of Captain Limousines.

2. America's Best Investment Corporation (America's Best Investment) was a Texas corporation founded by defendant **Ali** in on April 20, 2010. When incorporated, America's Best Investment was based in Irving, Texas. In the filed incorporation

documents, **Ali** was listed as the sole Registered Agent and sole member of the Board of Directors.

3. Captain Limousines Worldwide Transportation, LLC (Captain Limousines Worldwide) was a Texas corporation founded by defendant **Ali** and others on May 12, 2010. When incorporated, the Registered Agent of Captain Limousines Worldwide was located in Dallas, Texas.

4. DFW Ground Link Transportation, LLC (DFW Ground Link) was a Texas corporation founded by defendant **Ali** on August 24, 2012. When incorporated, DFW Ground Link was based in Irving, Texas. DFW Ground Link specialized in private transportation and provided various types of chauffeured limousine vehicles for various transportation needs. In the filed incorporation documents, **Asif Ali** was listed as the sole Registered Agent of DFW Ground Link.

5. Global Taxi and Transportation, LLC (Global Taxi) was a Texas corporation founded by defendant **Ali** on July 15, 2015. **Ali** was listed as the Registered Agent for Global Tax in the incorporation documents.

Count One
Wire Fraud, Aiding and Abetting
(Violations of 18 U.S.C. §§ 1343 and 2)

1. The United States Attorney hereby adopts, realleges and incorporates by reference herein the allegations contained in the Introduction to this Information as if fully set forth herein.

Scheme to Defraud

2. During the period from at least in or about December 2009 through in or about April 2017, defendant **Asif Ali**, devised and intended to devise a scheme to defraud at least 11 investors, and to obtain money and property from these investors by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

3. It was a part of the scheme to defraud that during the period from at least in or about December 2009 to April 2017, defendant **Ali** made a series of false representations in order to fraudulently induce several investors to provide **Ali** with investment funds totaling at least \$4,000,000. **Ali** made some of these false representations directly to one or more investors.

4. It was a further part of the scheme to defraud from 2009 through 2017, **Ali** fraudulently collected at least \$4,291,000 from several investors. During this same period, **Ali** repaid investors at least \$613,000.

5. It was a further part of the scheme to defraud that **Ali** falsely represented to investors that he would use investor funds to further the business operations of Captain Limousines, Inc. in North Texas. In fact, none of the money was used for the operating

expenses of **Ali's** business Captain Limousines, Inc.. **Ali** concealed from investors that the majority of the \$4 million invested funds were disbursed as cash withdrawals.

6. It was a further part of the scheme to defraud that **Ali** sent at least twenty fraudulent emails to investors which falsely represented that **Ali** had recently wired or attempted to wire funds to his investors. **Ali** attempted to deceive investors by sending investors false emails which falsely represented to investors that documents attached to the emails were receipts for wire transfers to the investors. In fact, these so-called "wire transfer receipts" were completely fictitious. As part of the scheme to defraud, **Ali** falsely represented in these emails to investors that **Ali** had actually made legitimate transfers to his investors.

7. It was a further part of the scheme to defraud that **Ali** falsely represented to investors, verbally and via text message, that **Ali** had recently wired investors payments on their investments. In truth, **Ali** secretly created fictitious wire transfer receipts and sent these phony documents to investors via text message in an effort to deceive and defraud his investors. **Ali's** sent these false emails and text messages to investors in order to relieve pressure from investors who were demanding a full accounting of their investment funds.

8. As a result of this scheme, defendant **Asif Ali** fraudulently obtained and spent investor funds totaling at least \$4,000,000.

Interstate Wiring Used to Carry Out the Scheme to Defraud

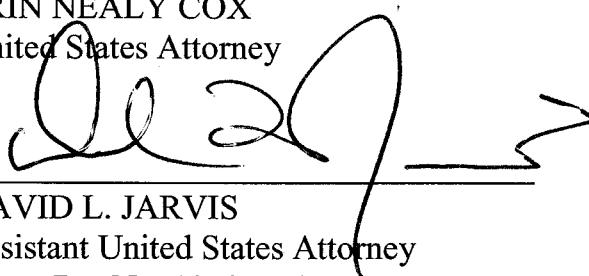
9. On or about March 9, 2017, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant **Asif Ali**, for the purpose of carrying out and

executing the scheme to defraud described above, and attempting to do so, by using computers located in the Northern District of Texas, did knowingly and with the intent to defraud, cause to be transmitted by electronic email communications to Google Gmail computer servers located outside the state of Texas by wire in interstate commerce by means of wire and radio communications, certain writings, signs, signals, and sounds constituting an electronic interstate email communication in and through the Northern District of Texas, in the following manner: **Ali** falsely represented in an email to investor D.Y. that **Ali** recently received a wire transfer of \$3,192,877 from Barclays Bank. As part of this false and fraudulent email used to deceive investor D.Y., **Ali** attached to this email a fictitious "wire transfer receipt" from Barclays Bank created by **Ali** as part of the scheme to defraud investor D.Y.

In violation of 18 U.S.C. §§ 1343 and 2.

Respectfully submitted,

ERIN NEALY COX
United States Attorney



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